

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year 2018

Date filed: **February 27**, 2019

Name of companies covered by this certification:

Gogo Business Aviation LLC

Form 499 Filer ID: **822226**

Name of signatory: **Marguerite Elias**

Title of signatory: **Secretary**

I, Marguerite Elias, certify that I am an officer of Gogo Business Aviation LLC ("the Company"), and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has not taken any actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The Company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed: 

Marguerite Elias
Secretary

Gogo Business Aviation LLC
111 N. Canal St.
Chicago, IL 60606

Gogo Business Aviation LLC
Explanatory Statement Regarding
CPNI Compliance for 2018

Gogo Business Aviation LLC (“the Company”) is a specialized reseller of satellite telecommunications services and a provider of terrestrial-based broadband and interconnected VoIP services to the general aviation market. The Company has a limited customer base of mostly independent corporate and fractional aircraft owners/operators.

The Company does not use CPNI for marketing purposes, nor does the Company disclose or permit access to CPNI to third parties for marketing purposes. Therefore, requirements contained in the CPNI rules relating to the process for obtaining customer consent for the use of CPNI for marketing purposes (as well as the recordkeeping and supervisory review requirements associated with outbound marketing campaigns) are not applicable to the Company. Should the Company change its policies in the future, it will ensure that the appropriate procedures are in place for obtaining customer consent.

The Company provides adequate safeguards to protect against the unauthorized release of CPNI. Access to CPNI is not provided in person, as the Company does not have retail stores. CPNI is not released in response to customer-initiated telephone calls until the customer has been properly authenticated. No call detail information is released in response to customer-initiated telephone calls, although representatives of the Company will discuss call detail information that is first provided by the customer. Otherwise, requests for call detail information are satisfied by contacting the authorized account representative at the telephone number or address (including e-mail address) of record. Online access to CPNI is available only through the use of customer-generated passwords, for which the Company does not prompt the use of biographical or account information. The authorized account representative is notified whenever there has been a change to a password or to account details (*e.g.*, account address).

The Company has not experienced any known breaches of CPNI to date. However, the Company is aware of its obligation to report any breaches to law enforcement agencies via the breach reporting facility located at <https://www.cpnireporting.gov/>. The Company further understands that it may not notify the affected customer for seven days after reporting the breach. The Company will retain records for two years relating to any discovered breaches.

The Company takes seriously its obligation to safeguard CPNI. The Company has trained its employees with access to CPNI on the limited purposes for which they are authorized to use CPNI, and on the critical importance of adequately protecting CPNI from misuse or unauthorized disclosure. It is the Company’s policy that any employee who fails to follow the established policies and procedures with regard to CPNI will be subject to disciplinary action.